

## REMARKS

Applicant respectfully requests the reconsideration of the application and the consideration of the following remarks.

Claims 7, 13, 17 and 31 were rejected under 35 U.S.C. 103(a) as being unpatentable over Chen (U.S. Patent No. 4,573,199); claims 8-9, 14, 18, 32-33 were rejected under 35 U.S.C. 103(a) as being unpatentable over Chen in view of IBM (IBM Technical Disclosure Bulletin, May 1993, Vol. 36, Issue 5, pp. 491-492); claims 10 and 34 were rejected under 35 U.S.C. 103(a) as being unpatentable over Chen in view of IBM and further in view of Toshiba (Japan Patent 07191856); claims 20-24, 35-49 were rejected under 35 U.S.C. 103(a) as being unpatentable over Chen in view of Toshiba. Claims 7, 10, 13, 17, 31, 34, 36, 41 and 46 are currently amended. No claims are currently added or canceled. Thus, the claims currently pending in the application are claims 7-10, 13-14, 17-18, 20-24 and 31-49.

Claims 20-24 and 35-49 were rejected under 35 U.S.C. 103(a) as being unpatentable over Chen in view of Toshiba. Applicant respectfully submits that the claimed invention must be considered as a whole. Chen does not disclose the limitation of “the processor emulating a second font utilizing the first font in response to the instructions”, since in the claim it is recited that “the BIOS memory storing a first font and instructions”. Chen discloses an enlargement procedure in which a large font (e.g., 28×28) is generated using a small font (e.g., 24×24) and “side information”. The disclosure of Chen does not show that enlarging of the 24×24 font is in response to the instructions stored in BIOS. Toshiba discloses *an access control mechanism* for copying information in the ROM into RAM to avoid loss of font data during copying process. Applicant respectfully submits that avoiding loss of font data during copying process is not the reason for having the font in BIOS. Neither Chen nor Toshiba teaches to emulate one font using another font in response to BIOS

instructions. Thus, the disclosure of Chen and Toshiba does not contain all the corresponding limitations of claims 20, 35, 40 and 45. When viewed as a whole, the disclosure of Chen and Toshiba does not reasonably suggest the arrangements recited in claims 20, 35, 40 and 45. Thus, the withdrawal of the rejections under 35 U.S.C. 103(a) for claims 20, 35, 40 and 45 and their dependent claims 21-24, 36-39, 41-44 and 46-49 is respectfully requested.

Claims 7, 13, 17 and 31 were rejected under 35 U.S.C. 103(a) as being unpatentable over Chen. However, Chen does not disclose the limitations recited in claims 7, 13, 17 and 31, including “automatically stripping a top line and a bottom line from the first font to simulate the second font; wherein the first font comprises an  $n \times (m+2)$  font and the second font comprises an  $n \times m$  font.” The examiner asserted that it would have been obvious to delete the top and bottom lines because this would not distort the font as much. However, Chen does not show any evidence suggesting such a method; and, the examiner did not show any document to support the assertion. Applicant respectfully submits that the limitation of “automatically stripping a top line and a bottom line from the first font to simulate the second font” is not found in the prior art documents.

35 U.S.C. 103(a) provides that “Patentability shall not be negated by the manner in which the invention was made.” And, MPEP (2141) provides that “When applying 35 U.S.C. 103, the following tenets of patent law must be adhered to: (A) The claimed invention must be considered as a whole; (B) The references must be considered as a whole and must suggest the desirability and thus the obviousness of making the combination; (C) The references must be viewed without the benefit of impermissible hindsight vision afforded by the claimed invention; and (D) Reasonable expectation of success is the standard with which obviousness is determined.” Without any prior art documents showing the corresponding limitation of the claims, Applicant respectfully submits that the assertion of obviousness was

based on the hindsight vision afforded by the claimed invention and thus the rejection is improper.

Chen teaches a method which allows an *enlarged font* of complex characters to be produced (see, e.g., abstract of Chen). However, simulating an  $n \times m$  font using an  $n \times (m+2)$  font is clearly not a process of enlarging a font. An  $n \times m$  font is smaller than an  $n \times (m+2)$  font. The description of Col. 2, lines 21-30, of Chen shows that the techniques mentioned in that paragraph can produce serious distortions in the generated characters (see, e.g., Col. 2, lines 31-33), which discourages the use of the mentioned techniques. The description of Col. 7, lines 44-67 and Col. 8 lines 1-5 relates to the generation of "side information" for the enlargement of a  $24 \times 24$  font to a  $28 \times 28$  font. The "side information" is individually generated for each character using an algorithm based on density functions (e.g., Figure 6 of Chen) or using an interactive tool (e.g., Figure 7 of Chen). For example, Figure 6 shows a method to derive "side information" from the  $24 \times 24$  font and the  $28 \times 28$  font. Both fonts are used as input data in this process. Since "side information" is individually derived for each character, each character is enlarged differently according to the corresponding "side information". In Chen, there is no teaching of applying a uniform operation to all characters to scale a font. Thus, the disclosure of Chen, when considered as a whole, does not reasonably suggest the subject matter as claimed in claims 7, 13, 17 and 31. Thus, the withdrawal of the rejections under 35 U.S.C. 103(a) for claims 7, 13, 17 and 31 and their dependent claims 8-10, 14, 18 and 32-34 is respectfully requested.

Claims 8-9, 14, 18, 32-33 were rejected under 35 U.S.C. 103(a) as being unpatentable over Chen in view of IBM. IBM discloses the use of font  $9 \times 16$ ,  $9 \times 14$  or font  $8 \times 16$ ,  $8 \times 14$  in system ROM. However, neither Chen nor IBM suggests to simulate a  $9 \times 14$  font with a  $9 \times 16$  font or to simulate an  $8 \times 14$  font with an  $8 \times 16$  font. Neither Chen nor IBM suggests striping

a top line and a bottom line from a large font to simulate a small font. Chen specifically describes only the *enlargement* of a font from 24×24 to 28×28.

Further, the abstract of Toshiba does not support the examiner's assertion of "JP 07191856 discloses a first memory coupled to the processor, the processor copying the first font from the BIOS memory into the first memory to emulate the second font", which were used for the rejection of claims 22, 36, 41, 46, 10 and 34. Toshiba does not suggest copying the font to emulate another font.

Thus, the disclosure of Chen, Toshiba and IBM does not suggest emulating a small font using a large font in response to BIOS instructions, in which a top line and a bottom line are stripped from the large font to simulate the small font. Therefore, Applicant respectfully submits that the pending claims are allowable over the prior art references.

Please charge any shortages or credit any overages to Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN

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\_\_\_\_\_  
Lehua Wang  
Reg. No. 48,023

12400 Wilshire Boulevard  
Seventh Floor  
Los Angeles, California 90025-1026  
(408) 720-8300